CLARK COUNTY SCHOOL DISTRICT 1 OFFICE OF THE GENERAL COUNSEL 2 CRYSTAL J. HERRERA, ESQ. Nevada Bar No. 12396 3 5100 West Sahara Avenue Las Vegas, Nevada 89146 4 Telephone: (702) 799-5373 Facsimile: (702) 799-7243 5 Herrec4@nv.ccsd.net 6 Attorneys for Defendants 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 SARA QUINTANA, Case No.: 2:21-cv-00023-GMN-NJK 10 11 Plaintiff, STIPULATION AND [PROPOSED] 12 ORDER TO EXTEND TIME FOR v. **DEFENDANTS TO FILE REPLY IN** 13 CLARK COUNTY SCHOOL DISTRICT, a SUPPORT OF THEIR MOTION TO political subdivision of the State of Nevada, and **DISMISS** 14 the BOARD OF TRUSTEES OF THE CLARK 15 COUNTY SCHOOL DISTRICT, in their official (FIRST REQUEST) capacities, 16 Defendants. 17 Plaintiff Sara Quintana and Defendants Clark County School District ("School 18 District") and the Board of Trustees of the Clark County School District ("Board;" collectively, 19 "Defendants"), by and through their respective counsel of record, hereby stipulate to extend the 20 21 time for Defendants to file a reply in support of their Motion to Dismiss (ECF No. 6) from the 22 current deadline of February 17, 2021 for seven (7) days, up to and including February 24, **2021.** (ECF No. 13). This is the first request for an extension of time for this deadline. 23

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Defendants seek the extension of time to allow sufficient time to prepare an appropriate reply. Defendants filed a Motion to Dismiss on January 13, 2021 (ECF No. 6). Plaintiff filed a Response on February 10, 2021, after receiving a two-week extension (ECF No. 11). Accordingly, the deadline for Defendants to file a reply in support of their Motion to Dismiss is February 17, 2021. Counsel requires additional time to evaluate and address Plaintiff's

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response to administrative exhaustion concerns. Defendants' counsel will also be taking time 1 2 off through February 16, 2021 in light of the long weekend and will be unable to properly evaluate and prepare a reply by the current responsive deadline. 3 Based on the foregoing, the parties hereby stipulate to a short extension of time, until 4 February 24, 2021, for Defendants to file a reply to their Motion to Dismiss. The one (1) week 5 extension will have no significant or prejudicial impact on the proceedings. This request is 6 7 made in good faith and not for the purpose of delay. Dated: February 12, 2021. 8 9 CLARK COUNTY SCHOOL DISTRICT OFFICE OF THE GENERAL COUNSEL 10 By: Crystal J. Herrera 11 Crystal J. Herrera (#12396) 5100 West Sahara Avenue 12 Las Vegas, Nevada 89146 13 Attorney for Defendants 14 Dated: February 12, 2021. 15 KEMP & KEMP 16 17 By: James P. Kemp James P. Kemp, Esq. (#6375) 18 Victoria L. Neal, Esq. (#13382) 7435 W. Azure Dr., Ste. 110 19 Las Vegas, NV 89130 Attorney for Plaintiff 20 21 **ORDER** 22 IT IS SO ORDERED. 23 24 Dated this 16 day of February, 2021. 25 26 27 Gloria M. Navarro, District Judge

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